

### REMARKS

Reconsideration and allowance of this application are respectfully requested in light of the above amendments and the following remarks.

Claims 1, 2, 18, and 19 have been canceled and claim 20 has been newly added. Claim 20 has been drafted to avoid the issues underlying the formal objections, the 35 USC 101 rejection, and the 35 USC 112, second paragraph, rejection applied against claims 1, 2, 18, and 19. It is submitted that support for the subject matter of new claim 20 is provided at least in Figs. 2-4D and the discussion thereof at specification pages 3, 4, 22, and 23.

Claims 1, 2, 18, and 19 were rejected, under 35 USC §102(e), as being anticipated by Lukanc (USPN 6,615,400). To the extent these rejections may be deemed applicable to new claim 20, the Applicants respectfully traverse based on the points set forth below.

Claim 20 defines a method for inspecting formation defects in the wiring of a chip layout.

According to this method, the density of contact holes in a wiring layout is calculated, wiring defects are determined to exist when the calculated density reaches a predetermined value, and the defects are corrected by decreasing the density of

contact holes within the wiring layout without changing the size of the contact holes. Thus, the claimed invention provides advantages of: (1) reducing the density of contact holes below a predetermined value, without (2) changing the size of the contact holes.

By contrast to the above-noted claimed features, Lukanc discloses replacing a large number of vias with a smaller number of vias such that the combined area of the smaller number of vias equals or exceeds the combined area of the large number of vias (see Lukanc Fig. 1 and its accompanying description in the specification). Thus, Lukanc does not disclose the claimed features of reducing the density of contact holes below a predetermined value and doing so without changing the size of the contact holes. Nor does Lukanc suggest these features.

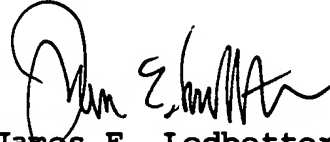
Accordingly, the Applicants submit that Lukanc does not anticipate or render obvious the subject matter defined by claim 20. Therefore, it is submitted that allowance of claim 20 is warranted.

In view of the above, the Applicants respectfully submit that this application is in condition for allowance, and a notice to that effect is respectfully solicited.

If any issues remain which may best be resolved through a telephone communication, the Examiner is requested to telephone

the undersigned at the local Washington, D.C. telephone number listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James E. Ledbetter". The signature is stylized with a large initial "J" and a cursive "E".

James E. Ledbetter

Registration No. 28,732

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JEL/DWW/att

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